

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

DREW MACEWEN, ANDREW BARKIS,
CHRIS CORRY, BRANDON VICK, KELLY
CHAMBERS, MICHAEL MCKEE, FRAN
WILLS, BRUCE RUSSELL, Phil Fortunato,
Dave McMullan, Isaac Vellekamp, and Marcus
Torrey,

Plaintiffs,

v.

JAY INSLEE, in my official capacity as the
Governor of Washington,

Defendant.

No. 3:20-cv-05423

DECLARATION OF BRUCE RUSSELL

I, Bruce Russell, make the following declaration under penalty of perjury:

1. I am a plaintiff in the above-entitled action and have personal knowledge of the facts stated herein.
2. I am a resident of Washington.
3. I also own and operates Lake Bowl.
4. For over 60 years and 3 generations of working family members, Lake Bowl has successfully and steadily grown its business.
5. It started from a small bowling center and snack bar in 1957 to a business that now includes the bowling center with a 250 seat full service restaurant and tap house, a Washington state

1 enhanced card room, 4 redemption arcades across the state, a 60 room hotel, and a 7500-barrel
2 microbrewery that retails product across Washington state.

3 6. Due to the forced closures by the Governor due to COVID-19, all of Lake Bowl's businesses
4 have been severely impacted.

5 7. I have had to furlough over 100 employees.

6 8. I have lost more than 95% of my business income throughout this period.

7 9. Aside from current losses, I also anticipate that business won't "get back to normal" under the
8 reopening phases proposed by Governor Inslee for several months, if at all.

9 10. Never in history have Lake Bowl and my family faced such financial hardship.

10 11. Now I have learned that Tribal casinos (including their restaurants, spas, and retail shops) in
11 Washington are opening their doors several weeks before many Washington businesses,
12 including Lake Bowl, are able to open under theirs under the Governor's plan.

13 12. Furthermore, my family and I have not been able to attend church services which have been
14 restricted due to the lockdown.

15 13. Now, people will be able to congregate in large crowds to entertain themselves at a competitor
16 business just down the road, while Lake Bowl will continue to be shuttered and my family and
17 I cannot go to church.

18
19 SIGNED, May __, 2020, at _____, Washington.

20
21 BY: _____
22 BRUCE RUSSELL
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- 1 6. Due to the forced closures by the Governor due to COVID-19, all of Lake Bowl's businesses
2 have been severely impacted.
- 3 7. I have had to furlough over 100 employees. I have had to put about 80 employees back on
4 payroll in order to qualify for the Paycheck Protection Program, but the remainder remain
5 furloughed.
- 6 8. I have lost more than 95% of my business income throughout this period.
- 7 9. Aside from current losses, I also anticipate that business won't "get back to normal" under
8 the reopening phases proposed by Governor Inslee for several months, if at all.
- 9 10. Never in history have Lake Bowl and my family faced such financial hardship.
- 10 11. Now I have learned that Tribal casinos (including their restaurants, spas, and retail shops) in
11 Washington are opening their doors several weeks before many Washington businesses,
12 including Lake Bowl, are able to open under theirs under the Governor's plan.
- 13 12. Furthermore, my family and I have not been able to attend church services which have been
14 restricted due to the lockdown.
- 15 13. Now, people will be able to congregate in large crowds to entertain themselves at a
16 competitor business just down the road, while Lake Bowl will continue to be shuttered and
17 my family and I cannot go to church.

18
19 SIGNED, May 25, 2020, at Moses Lake, Washington.

20
21 By: 
22 Bruce Russell